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September 15, 2023

Hon. Evelyn Padin, U.S.D.J.
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: **In the Matter of the Verified Petition of American Maritime Services
of New York to Preserve Evidence in Aid of Anticipated Litigation
Pursuant to Rule 27 Fed. R. Civ. P.
Civil Action No. 2:23-cv-04109-EP-JRA**

Dear Judge Padin:

Pursuant to the Court's August 16, 2023, Text Order (Document No. 33), and with the consent of all parties, I am writing on behalf of Respondent Grimaldi Deep Sea S.p.A., to advise the Court that the Rule 27 depositions of crew members Abeladro Pua, Nicholo Lequigan, Marian Ciumala, Renato Mandapat and Frederico Crivelli were completed this week, and they will, by mutual agreement of the parties, now leave the jurisdiction of the Court.

Only Captain Alessandro Moretti's deposition remains to be completed, and the parties expect it will finish later today. Assuming that deposition is completed and all parties consent, he will also leave the jurisdiction of the Court.

Respectfully submitted,

John J. Levy

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JJL:med

cc: All Counsel of Record *via ECF notification*

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

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